

22 cr 238 JRT

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INFORMATION

Plaintiff,

18 U.S.C. § 371

v.

HADITH YUSUF AHMED,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT: MINNEAPOLIS, MINNESOTA

Count 1

(Conspiracy to Commit Wire Fraud)

From at least in or about September 2020 through in or about 2022, the defendant,

HADITH YUSUF AHMED,

conspired with others known and unknown to devise a scheme and artifice to defraud and to obtain money by materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice, transmitted or caused to be transmitted writings, signs, signals, pictures, or sounds by means of wire, radio or television communication in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 371 and 1343.

FORFEITURE ALLEGATIONS

1. If convicted of Count 1 of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and

RECEIVED

SEP 19 2022

CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

SCANNED

SEP 19 2022

U.S. DISTRICT COURT MPLS

Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to Count 1 of the Information.

2. The property subject to forfeiture includes, but is not limited to:

a. \$318,042.11 seized from Wells Fargo account No. 3962979872, held in the name of HADITH YUSUF AHMED;

b. \$20,085.91 seized from Wells Fargo account No. \$3,506,066.80 seized from Bank of America account No. 3187389683, held in the name of HADITH YUSUF AHMED.

3. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

Dated: September 19, 2022

ANDREW M. LUGER
United States Attorney

/s/ Joseph H. Thompson
JOSEPH H. THOMPSON
HARRY M. JACOBS
CHELSEA A. WALCKER
MATTHEW S. EBERT
JOSEPH S. TEIRAB
Assistant U.S. Attorneys